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September 30, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

HAND DELIVERED

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: **Centennial Cellular Corp.**
1998 High Cost Universal Service Support
CC Docket No. 96-45

Dear Ms. Salas:

On behalf of Centennial Cellular Corp. ("Centennial"), we hereby request a waiver of the July 31 filing date established in Section 54.307(b) of the Commission's rules regarding the data submission requirements of competitive carriers eligible for high cost universal service support.

By letter dated August 20, 1998 (copy attached), Centennial submitted to USAC the information required under Section 54.307(b) as a competitive carrier eligible to receive high cost universal service support for 1998. Prior to filing the letter, we spoke with USAC staff who advised us to submit the filing and processing request directly to USAC. At that time, USAC staff members suggested that a waiver filing with the FCC might not be necessary, since there would be no impact on the USAC process or on other carriers as a result of Centennial's late-filed data submission. However, after further review and discussion with the FCC, USAC

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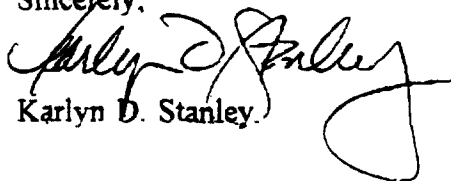
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Magalie Roman Salas
September 30, 1998
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determined that a formal waiver request was appropriate. See attached letter from USAC dated September 11, 1998.

We recognize that Section 54 of the rules specify that competitive carriers should file their data submissions before July 31 and hope that Centennial's late filing will not inconvenience USAC or the FCC or adversely impact the support distribution process. Although Centennial is working diligently to stay abreast of the new filing and reporting requirements applicable to competitive carriers, the confusion and volume of new information surrounding universal service caused them to overlook the July 31 filing date. We respectfully request that you accept Centennial's data submission filed with USAC on August 20, 1998.

Sincerely,



Karlyn D. Stanley.

cc: Sheryl Todd (FCC) (hand delivered)
Lisa Gelb (FCC) (hand delivered)
John A. Ricker (USAC)
Tom Webb (USAC)

USAC
UNIVERSAL SERVICE
ADMINISTRATIVE CO.

COPY

100 South Jefferson Road
Whippany, NJ 07981

September 11, 1998

Ms. Karyln D. Stanley
Cole, Raywid & Braverman, L.L.P.
Second Floor
1919 Pennsylvania Avenue N.W.
Washington, D.C. 20006-9750

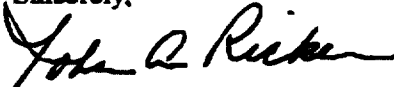
Re: Universal Service Funding for Centennial Cellular Corporation

USAC is in receipt of your August 20, 1998 letter requesting high cost support for your client's two operating entities providing telecommunications service in Puerto Rico beginning January 1, 1999. I regret to inform you that USAC cannot grant your request for support at this time.

As indicated in your letter, the FCC's rules require competitive eligible telecommunications carriers to notify the administrator by July 31st in order to receive universal service support for the following year. We have had discussions with the Commission regarding the receipt of requests after the July 31st date, and have been informed that in order for a carrier that has missed the date to be considered for support, it must file for waiver of §54.307 of the Commission's rules. The request for a waiver from the rule should be filed with the Common Carrier Bureau and it should provide a reason for granting the request.

If I can be of assistance to you in the interim, or you have additional questions, please contact me via telephone at (973) 884-8085 or via e-mail at jncker@ncea.org

Sincerely,



John A. Ricker
Director- Support Programs

cc: Ms. Cheryl Parrino, USAC- Chief Executive Officer

COLE, RAYWID & BRAVERMAN, L.L.P.

ATTORNEYS AT LAW

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MARK S. KRISTIANSEN*

*ADMITTED IN MASSACHUSETTS ONLY
*ADMITTED IN MARYLAND ONLY

August 20, 1998

Via Telecopier & Federal Express

Mr. John Ricker
Director of Support Programs
Universal Service Administrative Company
100 South Jefferson Road
Whippany, New Jersey 07981

Re: 1998 High Cost Universal Service Support for Centennial
Cellular Corp. in Puerto Rico -- Compliance with Filing
Requirements Under 47 C.F.R. Part 54

Dear Mr. Ricker:

On behalf of Centennial Cellular Corp. which owns two operating entities providing telecommunications services in Puerto Rico: Centennial PCS Operations Corp. ("Centennial PCS") and Lambda Operations Corp. ("Lambda"), we submit this letter to comply with the filing requirements of 47 C.F.R. 54.307(b) with respect to these carriers receiving high cost universal service support for 1998.

The attached Data Submission provides the number of working loops serviced by Centennial PCS and Lambda, as of December 31, 1997. Centennial PCS and Lambda have been certified as "eligible telecommunications carriers" under Section 214(e) of the Communications Act and therefore are eligible to receive high cost universal service support.

78371.1

Universal Service Administrative Company

August 20, 1998

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We recognize that Section 54 of the rules specify that competitive carriers should file their data submissions before July 31 and hope that Centennial's late filing will not inconvenience USAC or adversely impact the support distribution process. Although Centennial is working diligently to stay abreast of the new filings and reports required of competitive carriers, the confusion and volume of new information surrounding universal service caused them to overlook the July 31 filing date. We respectfully request that you accept the enclosed data submission for processing.

Should there be any questions regarding this matter, please contact Cathleen Schultz of this office.

Sincerely,

Karlyn D. Stanley (by cec)

Karlyn D. Stanley

Enclosures

cc: Mr. Tom Webb (NECA)

Centennial Communications Corp.

1998 Data Submission – High Cost Universal Service Support

| CARRIER | SERVICE AREA | NO. OF WORKING LOOPS SERVICED* - (As of 12/31/97) |
|---------------------------------|-----------------------|---|
| Centennial PCS Operations Corp. | Puerto Rico (PRTC) | 4,873 |
| Lambda Operations Corp. | Puerto Rico (PRTC) | 1,122 |

* All reported loops are new subscriber lines in Puerto Rico Telephone Company's service area.

CERTIFICATION

I, Michael A. Marrero, Vice President of Engineering and Technical Operations for Centennial Communications, do hereby certify that I have overall responsibility for the preparation of all data in the attached data submission for Centennial Communications and that I am authorized to execute this certification. Based on information known to me or provided to me by employees responsible for the preparation of the data in this submission, I hereby certify that the data have been examined and reviewed and are complete, accurate and consistent with the rules of the Federal Communications Commission.

Signed this 19th day of August, 1998.

A handwritten signature in dark ink, appearing to read "Michael A. Marrero", is written over a horizontal line.

Michael A. Marrero

Vice President, Engineering &
Technical Optns.